

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

In re Ethicon, Inc. Pelvic Repair System  
Products Liability Litigation

MDL No. 2327

THIS DOCUMENT RELATES TO ALL CASES

---

Application of Hunter J. Shkolnik for Plaintiffs' Steering Committee

COMES NOW, Hunter J. Shkolnik, in support of his application for appointment to the Plaintiffs Steering Committee in these combined cases pursuant to Initial Conference and Case Management Order (Pretrial Order No. 1). I submit this application for a position as a Steering Committee member and in support of the leadership structure proposed in the joint petitions of petition submitted by Harry F. Bell, Jr., Nominee for Plaintiffs' Co-Liaison Counsel; Paul T. Farrell, Jr. Nominee for Plaintiffs' Co-Liaison Counsel; Fred Thompson, III Nominee for Plaintiffs' Coordinating Co-Lead Counsel; and Bryan F. Aylstock Nominee for Plaintiffs' Coordinating Co-Lead Counsel and the proposed structure for leadership.

I am a Senior Partner in Napoli, Bern, Ripka & Shkolnik LLP, a law firm based in New York City with offices in N.J., Pa., Ill., Ca. & Fl. Our firm is recognized nationally for our handling of complex product liability and other matters of significant exposure. Our firm is heavily involved in litigation representing clients from all over the country, for products and exposures to drugs and other toxic substances. Our partners have extensive lists of presentations and published works in such areas as trial practice, drug and medical device litigation, medical malpractice, automobile and heavy truck product liability, class action litigation, expert witness preparation and Daubert challenges, and Federal and State procedural law etc.

I am Senior Partner in the law firm and as a focus my work is primarily in the areas of

drug product and medical device mass tort litigation, consumer class actions, commercial litigation, medical device, drug, auto and heavy truck and aviation product liability litigation. I am very active in the firm's mass tort litigation in terms of leading the discovery and trial teams of various mass torts, pharmaceutical and medical device litigations. I am also active in managing national litigation and plaintiff litigation groups including the American Association of Justice's Actos Litigation Group.


I currently am, or have been, a member of the Plaintiffs Steering Committee and/or a Lead Counsel in various mass tort litigations in the area drug product liability and other mass torts and class actions including: In Re: New York Diet Drug/Phen Fen Litigation, Plaintiffs Steering Committee and a Lead counsel; In Re: New York Sulzer Inter Op Hip and Knee Implant Litigation, Plaintiffs Steering Committee and a Lead counsel; Plaintiffs' Steering Committee Member, Trial, Expert, Discovery Sub Committees and Co-Lead Trial Team MDL No.05-1708 In Re: Guidant Corp. Implantable Defibrillators Products Liability Litigation; Steering Committee Member Strategic Planning, Expert and Discovery Subcommittees; MDL No. 05-1726 In Re: Medtronic Inc., Implantable Defibrillators Products Liability Litigation; Plaintiffs Steering Committee, NY State Consolidated Bextra/Celebrex Litigation; State Federal Liaison Counsel, MDL No. 1785, In Re: Bausch & Lomb, Inc., Contact Lens Solution Product Liability Litigation; In Re: New York Consolidated Bausch & Lomb Contact Lens Solution Litigation., Plaintiff Steering Committee and Lead trial attorney for the first scheduled bellwether trials; Plaintiffs Steering Committee In Re: Medtronic, Inc., Sprint Fide/is Leads Product Liability Litigation, MDL No. 08-1905 (Dist. Minn.); Plaintiffs Steering Committee: In Re: PepsiCo. Inc., Bottled Water Marketing and Sales Practices Litigation, MDL No. 08-1903); Plaintiffs Steering Committee In Re: Porn Wonderful Sales and Marketing Practices Litigation, MDL No. 10-2199; Plaintiffs Liaison Committee for Personal Injury and Wrongful Death In Re: Toyota Motor Corp. Unintended Acceleration Marketing MDL No.10-2151; Co-

Lead *In Re: Kaba Simplex Push Button Lock Sales and Marketing Litigation*, MDL No. 2220;(EDOH); Co-Lead Counsel *In Re: Fleet Oral Sodium Phosphate Solutions Litigation*, MDL No. 2066 (NDOH); Co-Lead Counsel, *In Re: Nuvaring Products Liability Litigation*, MDL NO. 1964 (MOED); Plaintiffs Steering Committee, MDL No. - 2272 *In Re: Zimmer NexGen Knee Implant Products Liability Litigation*; (NDill); Liaison Counsel *New Jersey Nuvaring Products Liability Consolidated Mass Tort Litigation*; Co-Liaison Counsel and Member of the Plaintiffs Steering Committee, *New Jersey Metaclopramide (Reglan) Product Liability Consolidated Mass Tort Litigation*; Plaintiffs Steering Committee MDL- 2244 *In Re: DePuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation*.

I have held officer positions in the New York State Trial Lawyers; Nassau County Bar Association; and Committee Chair Positions in ATLA Health Care Finance Litigation Group; Orthopedic Implant Litigation Group; AAJ Breast Cancer Litigation Group, Co- Chair of the AAJ Actos Bladder Cancer Litigation Group; Co Chair AAJ Heart Device Litigation Group, and the Chair of the Medtronic ICD and CRTD Litigation Sub Group. I have lectured extensively in the areas of medical malpractice, medical device, and auto product and drug product liability. I have lectured and organized seminars on issues involving Guidant, Medtronic and St. Jude pacemaker, ICD and Lead Wire recall science and litigation; Cardiac Device product liability litigation, presenting scientific experts at trial and generally pharmaceutical litigation; Class Action topics such as Ethics of Mass Tort Settlements, Lone Pine, State Federal Coordination and Preemption, and on multiple occasions on the science related to various pharmaceuticals.

In sum, I believe my credentials and experience would make me an excellent choice for the Plaintiff's Steering Committee.

Respectfully Submitted  
NAPOLI BERN RIPKA SHKOLNIK LLP

A handwritten signature in black ink, appearing to read "Hunter J. Shkolnik". The signature is fluid and cursive, with the first name "Hunter" and last name "Shkolnik" clearly distinguishable.

Hunter J. Shkolnik  
Nominee for Plaintiffs' Coordinating  
Co-Lead Counsel  
Napoli, Bern, Ripka, Shkolnik LLP  
350 Fifth Avenue, Suite 7413  
New York, NY 10018  
(212) 267-3700  
[Hunter@NapoliBern.com](mailto:Hunter@NapoliBern.com)  
New York Bar No. 2031458